ECOS DRAFT: SELECTED RESPONSES FROM NEEDS ASSESSMENT

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GENERAL

What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?

For which skills does your state have the greatest need for compliance and enforcement inspector training?

All environmental programs - air, wastewater, storm water, drinking water, landfills, UST, animal feeding operations.

Wastewater facility inspections. All inspector investigation techniques including how to create a foolproof inspection report (i.e., when to take photos and how to do so correctly, report writing techniques that is legally solid, etc.).

A wide variety of heavy and light industry.

A basic inspector course. How to conduct an inspection and write an inspection memo.

Staff covers all media in this office (air, water, land, and pollution prevention)

All areas can use training assistance. Due to costs and travel issues, web-based and on-demand internet training is most valuable.
Paperwork reviews and documenting via photo and video.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?
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For which skills does your state have the greatest need for compliance and enforcement inspector training?
I am a supervisor of investigators that investigate the entire realm of environmental cases. We work mainly on hazardous waste, wastewater, asbestos, air, drinking water cases. We encounter a variety of violations and conditions. Each case is unique.
Our state has the highest need for training in the non-technical areas. We can explain what our hazardous waste statutes and rules state. Not to say this isn't a need, but not the highest need. We would like them trained about what strategies do the inspector or investigator utilize to gain evidence of what is actually happening at a site. How to coordinate investigations and/or inspections strategically. How to interview people. How to deal with people involving verbal conflict. EPA approved sampling methods and analytical methods. How to testify. We feel this can

be best addressed with in person training including practical exercises that greatly reinforces what is learned.
How to organize inspections and/or investigations; interviewing techniques; verbal defense and influence; sampling procedures along with ensuring appropriate and approved EPA methods photography; testifying report writing, case management.
It's all over the board. Ethanol plants, coal-fired power plants, electric arc furnaces, smelters, hazardous waste incinerators, engines, surface coating.
Paperwork is the most common but the least concerning. You can typically piece together the potential compliance if there isn't a complete lack of records, which is rare.
We would benefit most by having EPA contacts for the NESHAPs in part 63. The rules lack consistency which requires interpretation by subpart.

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For which skills does your state have the greatest need for compliance and enforcement inspector training?
We do inspections for all media - air, land, water. Issues with facilities having not read or understood their permit conditions or somewhat common.
The more complex and technical program

areas like drinking water and air will probably always be a priority need for training. If we continue to provide an emergency response role, this training will always be needed.

I'd like to take advantage of better technologies (tablets, smartphones, monitoring equipment, etc.) for our inspectors and to do it correctly we need to consider the training needs of our employees. Some embrace new technology and are eager to use it, while some may be hesitant, don't see the potential value, and may need additional training.

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AIR

What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?

For which skills does your state have the greatest need for compliance and enforcement inspector training?

As an air quality inspector, I encounter a wide variety of facilities; encounter federal regulations in the permits that are difficult to interpret; facilities also have difficulty interpreting, thus often the cause for compliance issues.

Interpretation and enforcement of federal regulations incorporated into permits.

Written material in plain English or in person class toreview specific subparts would be helpful.

How to write a comprehensive full

compliance report based on permit
conditions.
Air inspectors. Fugitive dust and VOC
emissions are our main focus. Dust
violations and paperwork violations are
our most common issues.
Our state enforcement staff has many years
of experience due to low turnover. It would
be nice to have annual training on new
federal rules when they come out.
How to handle conflicts.
Our staff include air inspectors, and our
major industry is oil and gas, with
refining and electric generation,
particularly coal, making up most of the
remainder.
Probably the biggest area of uncertainty is
with CEMs/COMs compliance and
enforcement, particularly with monitor
downtime, and how EPA and other states
are handling that related to the HPV policy.
There also seems to be a lot of confusion
regarding reporting of excess emissions due
to SSM.
CEMs/COMs date reduction and
interpretation.
Air. VOCs, NOx, PM. Stack test
exceedances. CEMs or excess emissions
issues. A very large variety.
LDAR (general), Subpart OOOO, Boiler
MACT (DDDDD)
How to understand federal regulations.

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What types of facilities, regulatory
conditions, and pollutants do you
most commonly encounter during
inspections?
For which area, rule, or subject
does your state have the greatest

need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
I am an air inspector. The most frequent
violations are paperwork errors,
however, exceedances are common in
growing facilities also.
This highest need for training would
probably be MACT regulations. We are
working towards that, however seems to be
many rules that are subject to opinion.
I'm an air inspector and frequently
encounter sources of VOC and HAPS.
We need MACT and NSPS training.
I'm an air inspector, I frequent metal
manufacturing facilities, asphalt plants,
mills, landfills, food production, and
surface coating operations, finding
paperwork and opacity violations.
My state enforcement staff have the highest
need for in-person train in Subparts 4z,
WWW, 6H, 7D, Dc, N, RRR.
Evidence gathering.
I'm an air inspector and I visit VOC/HAP
facilities and find pollutants of this
nature along with paperwork violations.
I also encounter hostile violators in
civilian situations (open burning).
MACT Rules, in person. Interviews and document inspections
(spot-checks)

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does your state have the greatest

need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
I am an air inspector and my facilities
are a wide range. My facilities include
but are not limited to asphalt/concrete
plants, fabricators, a paper company,
printing companies, and power plants.
Therefore, I commonly encounter all the
criteria air pollutants as well as
hazardous air pollutants.
There are several companies that are subject
to DDDDD, JJJJJJ, VVa, VVV, OOOO, PPPP,
etc. While I think eventually as knowledge
grows all these could eventually go to web
based (recorded webinars) but in person,
QA sessions are important in making sure
that there is a clear understanding.
How to conduct interviews; how to prep
is have to go before an administrative law
judge; how to collect evidence.
As air enforcement, we have trouble
with quarries (dust & maintenance) and
RICE rule compliance due to its
complexity.
RICE rules - in person. The more we can get
experience navigating this complex set of
rules, the better.
Air; refineries, ethanol facilities, coating
facilities, manufacturing facilities;
paperwork violations, test failures.
Air enforcement staff, in person MMMM/
PPPP/ 6H, coating facilities, ethanol
facilities.
How to document inspection notes, how to
conduct interviews.
I am an air inspector and inspect all

types of facilities and permit types.
My state air quality enforcement staff have the highest need for in-person training on the CAA.
NESHAP specific enforcement, and the penalty calc. process.
Air inspector. Primarily inspect oil & gas facilities and most violations are paperwork-related. Occasionally, emissions violations are discovered or other Level 1-type violations.
Air inspectors in my state predominantly work with oil & gas rules. The major rules where training would be beneficial are: MACT CC, HH, ZZZZ and DDDDD. NSPS J, KKK, IIII, JJJJ, OOOO and OOOOa.
Rule review and interpretation.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?
For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?
For which skills does your state have the greatest need for compliance and enforcement inspector training?
Air Quality - we inspect many types of industry, big and small. VOC's, HAP's, greenhouse gases, and criteria pollutants (CO, NOx, SOx, Particulate Matter).
Fugitive dusts are often encountered.
Lately, our encounters with pollutants from oil & gas industry have been on the rise. Federal subparts are numerous.
Too many to list actually. Everything. On the job training is best.

How to conduct annual emissions inventory reviews.

Facilities vary, PM, NOx, VOC emissions and paperwork violations.

MACT. N/A

I manage a program that conducts inspections of stationary sources of air pollution. The most common violations found during inspections are failure to maintain records and failure to install monitoring devices.

RICE Rules - NSPS and MACT: how to determine compliance with regulations, more specifically, which regulations are the engines actually subject to and which part of the regulations since there are so many categories. I believe any kind of training would suffice for this purpose; although on-the-job would be the least successful method.

How to conduct interviews, specifically what types of questions to ask beyond simply what's required in a permit.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

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For which skills does your state have the greatest need for compliance and enforcement inspector training?

Air inspector for all possible industry types. Spend more time reviewing reports than on-site inspection time.

In our state, Inspectors are spread way too

thinfor compliance responsibilities of all
federal and state regulations, stack testing,
and emissions inventory. Web-based topics
seems to be able to matchup experts in in
each area to help inspectors increase
inspectors' knowledge.
1. Knowing the compliance, monitoring, and
reporting requirements of the MACTs and
NSPSs.
2. Understanding the stack test methods.
Air compliance/enforcement inspections
- recordkeeping, emissions, permit/
regulation violations - Coal, power
generation, manufacturing, mineral
mining.
HPV/BEN training - written material.
Boilers, engines, chemical plants,
graphic arts, MACT sources.
Useful VOC calculation class. How to conduct interviews..
Criteria pollutants - EG and prime power
generators, power plants running on
wood, coal and oil, and processes with
toxics emissions such as auto restoration,
printing, HMA, landfills, etc.
We have a great need for in person HAP,
RTAP and VOC training. Mostly associated
with state rules and not NESHAPs. And
providing source compliance assistance on
the rules.
How to review findings with respect to rule
interpretation and when to provide
compliance assistance verses enforcement.

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What types of facilities, regulatory
conditions, and pollutants do you
most commonly encounter during
inspections?
For which area, rule, or subject
does your state have the greatest

need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
VOC's, criteria pollutants, a variety of
toxics including lead, Hg, HF, and VHAPs.
Surface coating operations, coal
fired boilers, aluminum processing
(primary and secondary), lead battery
manufacturing, chemical manufacturing,
and asphalt/concrete batch are common
sources. Violations often include
paperwork as well as stack test
determined emission exceedances.
RICE engines, boiler NESHAP's, NSPS
OOO, LL, general report writing techniques,
case development and evidence
documentation. In person is great, written
materials (updated) are also critical
references.
Report writing, evidence documentation,
fundamentals of violation determinations.
I am an inspector; I encounter a wide
variety of regulations and pollutants.
Most commonly, VOC/HAP, PM, other
criteria pollutants such as SO2 or NOx.
MACT. MACT, permitting.
Air inspector and a broad range of
facilities.
Boiler MACT, RICE MACT.
Industrial, Title V facilities, MACT/GACT MACT/GACT. Soft skills, how to say "no."

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What types of facilities, regulatory
conditions, and pollutants do you
most commonly encounter during
inspections?
For which area, rule, or subject
does your state have the greatest

need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
Refinery, power generation, chemical
manufacturing. Since I'm a senior
inspector the violations I find are various
in nature, CEMS have been a big issue
for most of the facilities I inspect. CEMS
violations include QA failures, large
amounts of missing data without
explanation, and reporting violations.
CEMS: I started out running a ambient
continuous monitoring network and I've
found that facilities have a very poor
understanding of the QC/QA requirements,
how to complete the proper data reduction,
how to report missing data, etc. We've found
this is a big issue with violations at about
50% of the facilities we inspect with CEMS
installed. The requirements overlap several
NSPS regulations.
Using excel to evaluate CEMS performance.
The state inspects a variety of sources
ranging from power plants, to bakeries,
to oil and gas exploration and production
facilities, to sand and gravel facilities.
The range of regulatory conditions
includes both state and federal
requirements. Often the state finds both
emission violations (e.g. sources
exceeding allowable limits as described
in their permits) and paperwork
violations (failure to maintain proper
records and/or to accurately report to
the state accordingly).
Our state has a need for training around
NANSR/ PSD, MACT ZZZZ, MATS, and

in-depth training around EPA's complex LDAR evaluations (where EPA does "data mining" of sourceprovided data). Ideally, these training needs could be met through in-person training by subject matter experts. Regulatory interpretation of federal requirements; Inspection report writing; critical thinking; internal and external communication skills; conflict resolution.

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WATER

What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?

For which skills does your state have the greatest need for compliance and enforcement inspector training?

Water Quality & 404. Very wide range of facilities.

Wastewater treatment upgrade planning and scheduling (lots of old infrastructure and the bill is coming due).

My state C&E staff have the highest need for training legal language use and interpretation (laws, permits, and letters).

Air inspectors. Fugitive dust and VOC emissions are our main focus. Dust violations and paperwork violations are our most common issues.

Our state enforcement staff has many years of experience due to low turnover. It would be nice to have annual training on new federal rules when they come out.

How to handle conflicts.

Construction stormwater-- violations
with implementation of BMPs and
discharges to waterways.
Industrial stormwater-- paperwork
violations and issues with representative
sampling and implementation of the
stormwater pollution control plans.
UIC inspections-- Autodrains and
municipalities with UIC permits for
managing stormwater.
How to conduct NPDES stormwater
inspections for construction and industrial
permits that meet EPA's expectations.
Overall NPDES inspections.

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What types of facilities, regulatory
conditions, and pollutants do you
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inspections?
For which area, rule, or subject
does your state have the greatest
need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
We are drinking water inspectors: We
often find that the GWR, Cross-
Connection Rule and the RTCR are most
often violated. Small systems lack the
experience of career operators to know
what to do and how to handle problems.
Submittal of required samples and cross
connections with equipment and the
drinking water system.
My state inspectors have the highest need
for webinar (based on real life examples)
training for the RTCR and GWR.
How to conduct interviews and

communication skills would be helpful. Also how to collect evidence.

My staff inspect non-community public water supplies. These are typically small drinking water systems like a school, manufacturing facility, or food plant that has their own water well. Since serving water to the public is not their primary business, they are typically not very familiar with the regulations.

Under the Safe Drinking Water Act, the noncommunity staff have the highest need for training in the RTCR-Revised Total Coliform Rule. Specifically Treatment Technique Violations. Systems quickly get triggered into increased monitoring. With over 9000 systems in our state, we are anticipating a huge workload as systems trigger into increased monitoring and we are anticipating many systems will "refuse" or "forget" to comply with the increased monitoring.

Probably proper legal documentation and tips on staying on top of regulatory deadlines.

Unauthorized wetland and in-water work.

Highest need is for staff to learn about the state Water Pollution Control Act and Shoreline Management Act compliance.

In-person training is best with experienced instructors.

Conducting and thoroughly documenting site inspections, conducting interviews and hearing preparation.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during

inspections?
For which area, rule, or subject
does your state have the greatest
need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
My group are NPDES/IPDES inspectors so
we frequently visits POTWs, industrial
facilities, construction sites, agricultural
facilities, and any other point source
discharger. We deal mostly with
conventional wastewater pollutants but
do encounter industrial pollutants as
well.
The highest need is in the NPDES area. Our
state is currently taking primacy over for this
program from EPA. We have a lot of new
inspectors coming on board that will need
basic inspector training as well as sector
specific training.
How to conduct interviews, how to properly
document compliance, and how to
determine the correct enforcement path.
Industrial wastewater and stormwater
facilities. Mostly inadequate BMPs,
paperwork violations, improper lab
equipment calibrations and record
keeping.
Effluent and receiving water sampling. In
person.
Sampling.
Drinking Water Systems, both
groundwater and surface water. NPDES
discharging facilities. Wastewater treatment
plants.
Lead and Copper Rule, RTCR, Surface Water
system treatment technologies.

Complaint response, treatment.
We respond to oil and hazardous
substance spills to water. We interact
with a wide variety of spillers - from
farmers to tank farms, from car owners
to refineries.
Our staff have the greatest need for training
in responding to and enforcing hazardous
substance spills to water.
On-scene investigation and documentation,
including sampling.

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What types of facilities, regulatory
conditions, and pollutants do you
most commonly encounter during
inspections?
For which area, rule, or subject
does your state have the greatest
need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
I am a stormwater inspector and I
typically visit construction sites and
industrial facilities and find SWPPP and
BMP violations.
Staff needs stormwater and MS4 training. Interviews and documenting for
enforcement cases.
AFO inspectors find on-site issue and
some paper work violations. Solid waste
will most likely be actual problems.
Water supply construction issues, WW
and air paper work.
Water Supply - in-person training for new
rules. AFO - in-person training for site
evaluations. WW - in person for complex
treatment systems.
Technical review- equipment, processes, etc.

My program is inspecting Concentrated
Animal Feeding Operations and generally
finds paperwork violations.
Probably the highest need is in-person
training for basic inspector type training.
Generally program specific and rule
knowledge is more easily picked up by on
the job training through reading the rule and
SOPs then shadowing inspectors over a
period of time observing how they are
applied in an inspection setting.
Technical requirements of the law and rules.

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WASTE
What types of facilities, regulatory
conditions, and pollutants do you
most commonly encounter during
inspections?
For which area, rule, or subject
does your state have the greatest
need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
I'm a RCRA compliance inspector -
conditions vary by location.
Web-based training (least expensive) would
be of greatest value.
Conducting and properly documenting
inspections and dealing with difficult
people.
Solid waste inspectors encounter
municipal solid waste, construction and
demolition waste, and some nonhazardous
industrial waste.
My state enforcement staff have the highest
need for in-person training for solid waste
management compliance and enforcement.

How to conduct interviews, how to deal with difficult people, how to take photos, prepare inspection reports, financial assurance, air quality rules, stormwater rules.
I'm in the RCRA program. We get a lot of violations of hazardous waste determination, labeling, open containers and contingency plans.
We need to bolster our general understanding of the RCRA program. We seem to be pretty weak in several areas. We are leaning on webbased programs and in-house review of specific areas of the rules.
How to conduct interviews is a skill that we could always use help with. Now we are also working on integrating technology into field inspections, conducting inspections with tablets.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?
For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?
For which skills does your state have the greatest need for compliance and enforcement inspector training?
Enforcement is taken for hazardous waste, solid waste, underground/leaking underground storage tanks, and confined feeding. HW-waste determinations resulting in improper disposal, exceeding storage timeframes; SW-improper disposal/dumping; UST-abandoned tanks

that contain regulated product that are not complying with any requirements and have not been closed; Confined Feeding - manure releases.
Advanced inability to pay - in person. HW new definition of solid waste - in person or interactive webinar.
Enforcement - negotiations.
Enforcement - Underground Storage Tanks.
Hazardous Waste, most common violation relate to proper labeling and mischaracterization of waste. In particular, mischaracterization relating to recycling exemptions for HW.
RCRA Subtitle C, Subpart AA/BB/CC. The changes in the Definition of Solid Waste rule. Exclusions and Exemptions related to the DSW.
Proper documentation (evidence) to prove a violation.
Hazardous Waste Inspections, I visit Ewaste, plating shops, and permitted sites and find a variety of violations.
Hazardous Waste Generator and Recycling Related Issues.
Hazardous Waste Generator and Recycling Related Issues.
Hazardous waste inspectors visit all hazardous waste generators and typically encounter a wide range of chemicals.
In-person training for the New Generator Rule.
Documentation during inspections.

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

For which area, rule, or subject
does your state have the greatest
need for compliance and
enforcement inspector training?
For which skills does your state have
the greatest need for compliance
and enforcement inspector training?
Hazardous waste, solid waste, used oil,
low-level radioactive waste, uranium mills
facilities and facilities using
radioactive isotopes in various applications.
Typical pollutants expected for these types
of facilities.
New hazardous waste generator rule,
financial assurance. In-person classroom
training.
Hazardous waste generators. RCRA, subpart AA, BB, CC New generator rules.
Hazardous Waste Inspections, I visit
Ewaste, plating shops, and permitted
sites and find a variety of violations.
Hazardous Waste Generator and Recycling
Related Issues.
Hazardous Waste Generator and Recycling
Related Issues.
I oversee contaminated sites work;
active and former military facilities,
bulk fuel storage facilities, shops, etc.
Failure to properly contain, cleanup and
manage waste is a common violation.
It is program specific. For contaminated
sites, training on CERCLA, RCRA and TSCA
[is] key.
Conducting and documenting field
inspections; waste characterization and
determinations;
I oversee contaminated sites work;
active and former military facilities,
bulk fuel storage facilities, shops, etc.
Failure to properly contain, cleanup and

manage waste is a common violation.
It is program specific. For contaminated sites, training on CERCLA, RCRA and TSCA [is] key.
Conducting and documenting field inspections; waste characterization and determinations;

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What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?
For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?
For which skills does your state have the greatest need for compliance and enforcement inspector training?
I am a hazardous waste compliance inspector. I deal with a multitude of hazardous wastes, hazardous materials and secondary materials.
New DSW. Issues with facilities generating hazardous secondary materials.
Sampling, inspection documentation, and issues with the new DSW.
Landfills, paperwork, litter, monitoring violations
Regulatory interpretation and application Personal communication skills, maintaining positive relationships with regulated community.
RCRA TSDFs are our most common facility. We find contaminants such as metals and VOCs.
My enforcement staff have the highest need for in-person training and OJT for treatment facilities.
How to conduct interviews.

Our solid waste inspectors are responding to complaints of illegal disposal and burning. They also inspect permitted landfills (MSW, Demo, Industrial).
Our Solid Waste staff have a need for a webinar or online training for gas and leachate monitoring exceedances.
Negotiations training - In person. Time management, case management (documentation) - Online or Webinar.
Service stations and other locations with petroleum underground storage tanks.
We discover many compliance issues during inspections.
Petroleum underground storage tanks inspections and enforcement. In-person training is most effective.
Documenting field information. Effective correspondence with the regulated community.

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OIL AND GAS

What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?
For which area, rule, or subject does your state have the greatest need for compliance and enforcement inspector training?
For which skills does your state have the greatest need for compliance and enforcement inspector training?
The sites inspected vary, but are typically Oil and Gas. The issues can be an array of things such as paperwork, late submissions of compliance reports, or failure to stack test.

63 Subpart JJJJ

63 Subpart IIII

63 Subpart ZZZZ

60 Subpart OOOO

60 Subpart OOOOa

Recordkeeping of all types, most problematic. Facilities rarely read through their permits.

Quad O training

Quad Z training

In-person training would be great.

Gathering appropriate info to address all conditions of the permit. Interviewing techniques [are] key to successful information gathering.

Our inspectors visit a wide variety of facilities with over 1200 Title V and Federally Enforceable State Operating Permitted sources statewide.

RICE - 40 CFR 63 Subpart ZZZZ

Industrial, Commercial, and Institutional Boilers and Process Heaters - 40 CFR 63 Subpart DDDDD and 40 CFR 63 Subpart JJJJJJ (6J)

Conducting interviews

Collecting evidence

Report writing

Petroleum products at gas stations Reduction in the percentage of compliance violations

Understanding equipment, testing, and analytical programs for petroleum release detection.

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PUBLIC COMPLAINTS

What types of facilities, regulatory conditions, and pollutants do you most commonly encounter during inspections?

For which area, rule, or subject

does your state have the greatest need for compliance and enforcement inspector training?
For which skills does your state have the greatest need for compliance and enforcement inspector training?
Public - environmental complaints (fugitive dust, open burning, open dumping, stormwater, surfacing sewage. Inspections of water & wastewater, solid waste, and air facilities.
We typically need training more specific to proper communication methods when dealing with responsible parties in complaint situations.
Communication and how to deescalate tense situations.
Landfill odor complaints. Drinking water complaints, PST issues. Inspections are generally a mix of paperwork and technical violations.
AIR (everything, we've have the most turnover statewide in Air). In-person Lead and Copper and RTCR training would be great, or a webinar.
Our inspectors are thoroughly trained in inspection skills. They need more training on the technical side of things.
We take complaints and provide informal and formal enforcement for all media.
We mostly inspect non-permitted sites from citizen complaints. We will also coinspect with the permit program compliance staff in order to better understand site conditions that lead to needing a permit. A significant percentage of our inspections are centered on various forms of waste, including junk vehicles, and water. We

occasionally do onsites for dust or open burning.

We have no glaring gap in particular media knowledge.

Advanced Inspection Techniques.

Developing information, solo and co-interview techniques, penalty negotiations, sampling (to keep their skills up to date).